

STATEMENT OF BASIS for Georgia-Pacific Gypsum LLC

TITLE V OPERATING PERMIT RENEWAL

Program Interest (PI): 51611 / Permit Activity Number: BOP140001

I. FACILITY INFORMATION

Georgia-Pacific Gypsum LLC is located at 1101 South Front Street, Camden, Camden County, NJ 08103, and consists of a gypsum wallboard manufacturing facility. The facility manufactures various types of gypsum wallboard products, and manufactures and sells classified (screened) gypsum rock, ground gypsum and calcined gypsum. The facility is owned and operated by Georgia-Pacific Gypsum LLC.

The facility is classified as a major facility based on its potential to emit 67.5 tons per year of oxides of nitrogen, and 32.9 tons per year of volatile organic compounds.

This permit allows individual hazardous air pollutant to be emitted at a rate to not exceed: 0.008 tons per year of polycyclic organic matter, 0.003 tons per year of lead and 0.001 tons per year of arsenic.

II. AREA ATTAINMENT CLASSIFICATION

The Federal Clean Air Act (CAA) sets National Ambient Air Quality Standards (NAAQS) for six common air pollutants. These commonly found air pollutants (also known as "criteria pollutants") are particulate matter, ground-level ozone, carbon monoxide (CO), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), and lead. The US Environmental Protection Agency (USEPA) also classifies areas as "attainment" or "nonattainment" for each criteria pollutant, based on the magnitude of an area's problem. Nonattainment classifications are used to specify what air pollution reduction measures an area must adopt, and when the area must reach attainment. Currently, the entire State of New Jersey is designated as nonattainment for the 8-hour ozone NAAQS and portions of the State are designated as nonattainment for the daily SO₂ NAAQS. This facility is located in a nonattainment area of the State in which the ambient air concentration exceeds 8-hour ozone NAAQS.

III. BACKGROUND AND HISTORY

The equipment that emits air contaminants from this facility include: process dryers, kettles, mills, bins, silos and material-handling equipment that are equipped with fabric filters that provide no less than 99% reduction of particulate emissions. There are also a process storage vessel, process water heater, board dryer, office boiler and printing equipment.

Consistent with N.J.A.C. 7:27-22.30(d) 1, Table 1 - Operating Permit Revision History (located at the end of this document) provides a summary of all the changes that have been incorporated into the operating permit through seven-day notice changes, administrative amendments, minor modifications, or significant modifications during the past five-year term of the initial operating permit or the most recent renewal thereof. Please refer to the attached explanation sheet for the structure and configuration of conditions of approval, included in the Facility Specific Requirements section of this permit.

As part of the 5-year renewal review and the public comment process, the Department requires major facilities to submit facility-wide emission trends for major sources of air contaminants. These graphs for the last five years are included at the end of this document.

IV. BASIS FOR MONITORING AND RECORDKEEPING REQUIREMENTS

The facility's operating permit includes monitoring, recordkeeping and reporting requirements that are sufficient to demonstrate the facility's continued compliance with the applicable requirements consistent with the following:

1. Provisions to implement the testing and monitoring requirements of N.J.A.C. 7:27-22.18, the recordkeeping and reporting requirements of N.J.A.C. 7:27-22.19, and all emissions monitoring and analysis procedures or compliance assurance methods required under the applicable requirements, including any procedures and methods promulgated pursuant to 40 CFR 64; and
2. Where the applicable requirement does not require direct periodic monitoring of emissions, the Department requires periodic monitoring of surrogate parameters sufficient to yield reliable data from the relevant time period that are representative of the facility's compliance with the permit.

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Such monitoring requirements include monitoring of fuel consumption, temperature, pressure drops, and process rates.

3. In situations where the underlying applicable requirement did not specify any periodic testing or monitoring, the following factors were considered in the evaluation and determination of the appropriate methodology for compliance demonstration for each emission unit:
- Pollutant's potential impact on public health and environment.
 - Emission unit and control device (older, less reliable equipment generally require more monitoring to ensure ongoing compliance).
 - Compliance history and margin of compliance.
 - Emissions variability and process stability (emissions units with highly variable process rates or materials generally require more monitoring to ensure ongoing compliance)
 - Quantity of emissions (emissions units that will have more impact on the environment generally require more monitoring to ensure ongoing compliance).

V. APPLICABLE STATE AND FEDERAL RULES

The facility is subject to New Jersey Air Pollution Control Regulations, codified in N.J.A.C. 7:27-1 through 34, as applicable. A complete text of these regulations is available at:
<http://www.nj.gov/dep/aqm/rules27.html>

The facility is also subject to Federal regulations listed below.

NSPS Subpart A: General Provisions
NSPS Subpart OOO: Standards of Performance for Nonmetallic Mineral Processing Plants
NSPS Subpart UUU: Standards of Performance for Calciners and Dryers in Mineral Industries
MACT Subpart A: General Provisions
MACT Subpart JJJJJJ: National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

The Greenhouse Gas (GHG) emissions from this facility are 103,685 TPY CO₂e and there is no GHG emissions increase.

FACILITY'S COMPLIANCE STATUS

The Department has determined that the facility does not meet all applicable requirements of the Federal Clean Air Act and the New Jersey Air Pollution Control Act. Facility's U7 Board Dryer does not comply with the hourly permitted limits for VOC (Total) and TSP based on stack testing. As a result, this draft permit includes compliance schedules for the facility to follow to achieve compliance. Contingent on compliance being achieved in accordance with the schedules, the Department has concluded that this air pollution control operating permit should be approved. The compliance schedules require that the facility achieve compliance if the facility intends to re-commence operation of the U7 Board Dryer and requires the facility to submit an operating permit modification request prior to re-commencing operation. The facility shall not re-commence operation of the U7 Board Dryer until such time that the Department has approved the modification request.

This operating permit includes a permit shield, pursuant to the provisions of N.J.A.C. 7:27-22.17. A permit shield provides that compliance with the relevant conditions of the operating permit shall be deemed compliance with the specific applicable requirements that are in effect on the date of issuance of the draft operating permit, and which form the basis for the conditions in the operating permit.

Also, prior to the expiration of the five-year period, the facility will be required to apply for a renewal of this operating permit, at which time the Department will evaluate the facility and issue a public notice with its findings.

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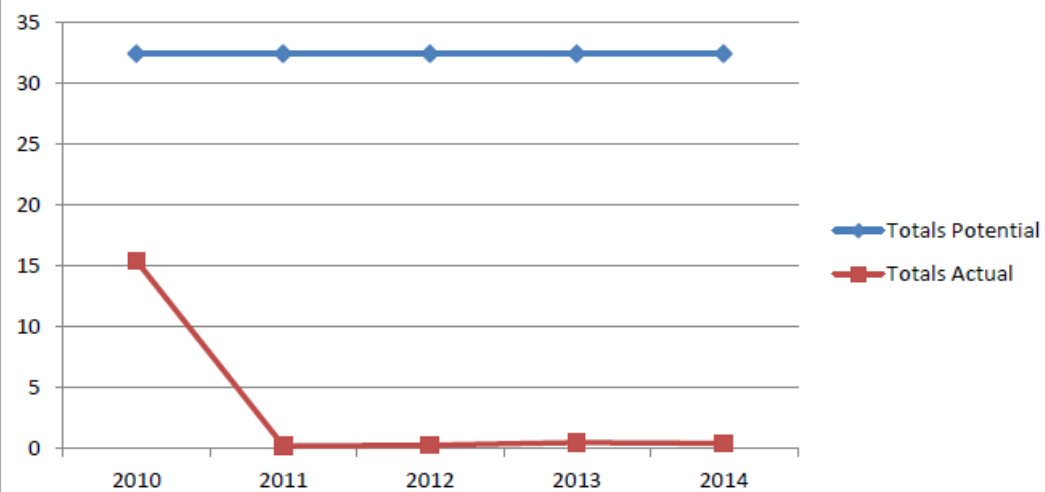
VI. EXEMPT ACTIVITIES

The facility's operating permit does not include exempt activities such as office and interior maintenance activities, maintenance shop activities, food preparation facilities, cafeterias and dining rooms, etc. A complete list of exempt activities, as allowed by the Operating Permit rule, can be found at N.J.A.C. 7:27-22.1.

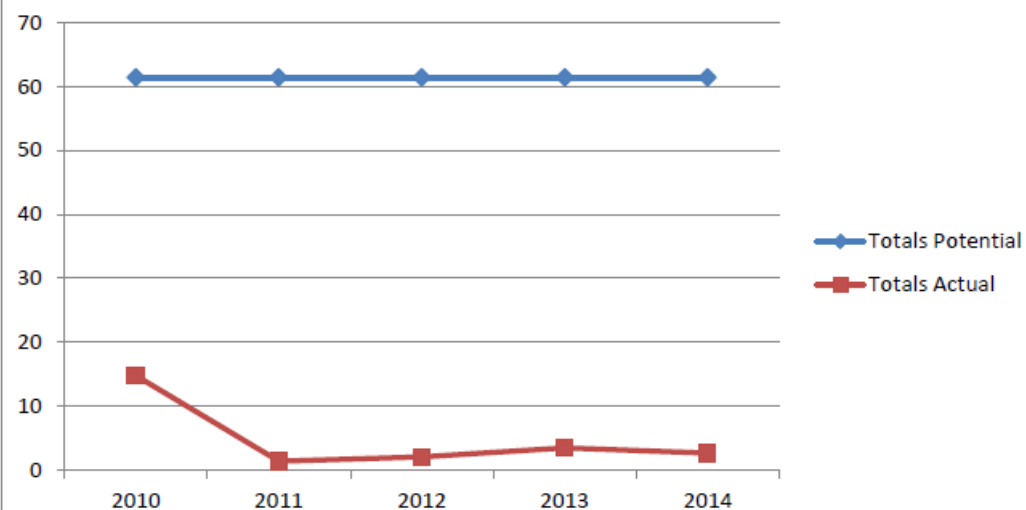
Table 1 - Operating Permit Revision History

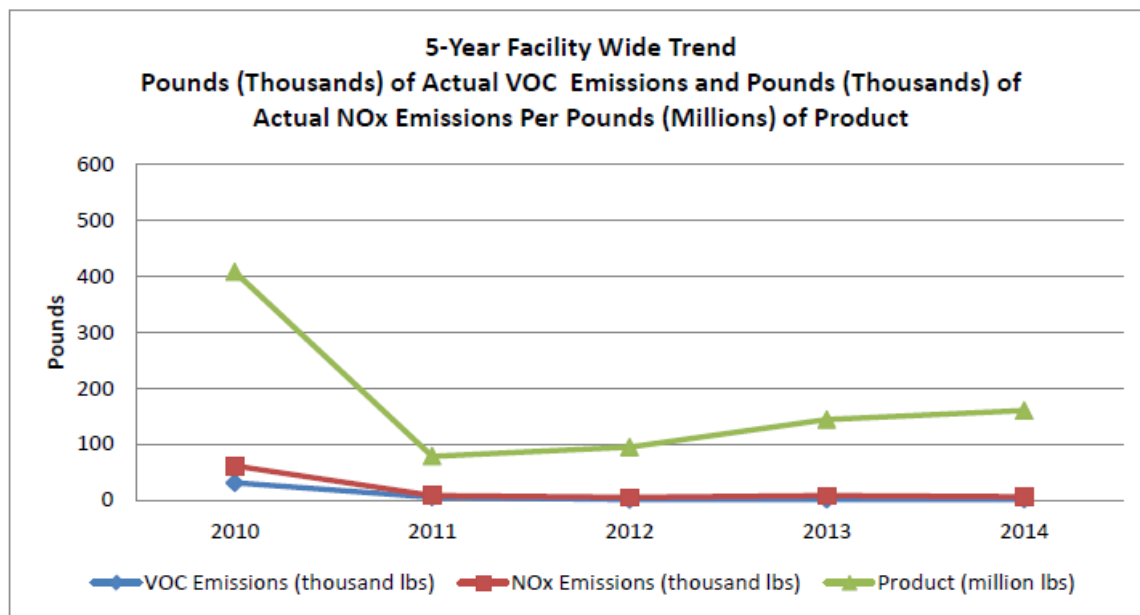
Facility Name:	Georgia Pacific Gypsum LLC	PI Number:	51611	Activity Number:	BOP140001
<u>Activity Number</u>	<u>Type of Revision</u>	<u>U/BP NJID</u>	<u>Description of Revision</u>		<u>Approval Date</u>
BOP150001	AA	Facility Profile	This administrative amendment updated the contact personnel at the facility, including Responsible Official, On-Site Manager, Air Permit Information Contact, Environmental Officer and BOP-Operating Permits contact.		1/28/2015

VOC Potential & Actual Emissions 2010-2014



NOx Potential & Actual Emissions 2010-2014





FACILITY NAME (FACILITY ID NUMBER)

BOP050001

Activity Number
(assigned by the
Department)

New Jersey Department of Environmental Protection Facility Specific Requirements

Emission unit number
(assigned by the
facility)

Brief description of emission unit

Emission Unit: U1 25 MM BTU/hour Boiler burning Fuel Oil and Natural Gas
Operating Scenario: OS Summary OR OSXX Boiler burning Fuel Oil

OS Summary lists all rules and requirements that apply to an emission unit, regardless of operating scenarios. Emission unit may contain one or more pieces of equipment and the corresponding operating scenarios

OSXX denotes the operating scenario number and lists the rules and requirements that apply to a particular scenario. An operating scenario represents various ways (or scenarios) a piece of equipment can operate.

Records to be kept

Submittal
requirement

Item
Number

Description of applicable
requirement

Air contaminants

Monitoring method to
ensure compliance

Actions to be
taken by the
facility

Ref.#	Applicable Requirement	Monitoring Requirement	Recordkeeping Requirement	Submittal/Action Requirement
1	Conduct a comprehensive stack test at emission point PTXX at least 18 months prior to the expiration of the approved operating permit to demonstrate compliance with the <u>CO, NOx, TSP and VOC</u> emission limits.[N.J.A.C. 7:27-22.16(e)]	Other: <u>Stack emission testing.</u> Stack test shall be conducted for CO, NOx, TSP, and VOC emissions (add language as needed). Based on any 60-minute period. [N.J.A.C. 7:27-22.16(e)]	Other: <u>Stack test results</u> . [N.J.A.C. 7:27-22.16(e)]	Stack Test - <u>Submit a protocol, conduct stack tests, submit results</u> : As per the approved schedule. <u>Submit a stack test protocol to the Bureau of Technical Services</u> (BTS) at PO Box 437, Trenton, NJ 08625 at least 30 months prior to the expiration of the approved operating permit. [N.J.A.C. 7:27-22.18(e)] and [N.J.A.C. 7:27-22.18(h)]

Rule citation (subchapter, section, and paragraph) for the applicable requirement

Rule citation for the monitoring requirement

Rule citation for the recordkeeping requirement

Rule citations for the submittal/action requirement